

EXHIBIT B

HUAWEI'S'S PROPOSED CONSTRUCTIONS AND INTRINSIC AND EXTRINSIC
EVIDENCE CITATIONS FOR JOINT CLAIM CONSTRUCTION AND PREHEARING
STATEMENT (P.R. 4-3)

EXHIBIT B**Huawei's Proposed Claim Constructions – U.S. Patent No. 6,958,986**

'986 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
1, 9, 17, 25	"scheduling [a] respective semi-permanent time slot[s]"	"assigning [a] respective time slot[s] to neighboring mobile nodes, reserved across a series of frames,"	1:27-32, 5:42-47, 7:50-54, 8:60-65, 12:4-5, 12:45-48, 12:52-60, 19:10-13, 14:1-13, 14:20-26, 15:18-29, 18:55-62, 19:4-13, 19:37-40, 26:43-53, 38:45-50, 49:31-44 Prosecution History and references cited therein Prosecution History of EP1614234 and references cited therein, including Office Action dated May 18, 2009, and reply dated Sep 18, 2009, and US6317436	
1, 5, 6, 9, 17, 21, 22, 25	"scheduling demand assigned time slots"	"assigning, responsive to utilization, time slots to nodes for which a semi-permanent time slot also is allocated"	15:57-65, 16:4-8, 26:30-36, 38:37-44	
1, 5, 6, 9, 17, 21, 22, 25	"link utilization metric[s]"	"measurement[s] of link usage or link demand"	7:54-57, 8:1-5, 8:57-60, 15:56-65, 26:54-60, 26:61-67, 39:19-25, 39:64-40:9, 41:27-37	

EXHIBIT B**Huawei's Proposed Claim Constructions – U.S. Patent No. 6,980,537**

'537 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
1, 10, 11, 16, 24, 25, 30, 33, 36, 38, 39, 40, 45, 47, 48, 49, 54, 58, 59, 63, 64, 68	"routing unit"/"relay unit"	"a network node that relays traffic between at least two other units within the network"	Abstract, 1:34-35, 2:14-31, 4:17-26, 5:30-34, 5:45-47, 12:18-19, 13:24-26.	<u>Microsoft Press Computer Dictionary, 3d Ed., 1997:</u> Router: An intermediary device on a communications network that expedites message delivery. <u>Dictionary of Computer Words, Revised Edition, Houghlin Mifflin Company, 1995:</u> Router: 1. A device in a network that handles message transfer between computers.
1, 16, 30, 33, 36, 45, 54, 58, 59, 63	"member unit"	"a node that does not relay traffic"	Abstract, 5:30-34, 4:19-21, 12:18-19.	
47	"designating as said routing unit each communication unit communicating with at least one neighboring unit isolated from communications with remaining neighboring units of that communication unit"	"designating as said routing unit each communication unit that has at least one neighboring node that can establish communications with at least one other neighboring unit of that communication unit only through that communication unit"	10:33-11:54, 12:2-13:6, 14:62-15:48, FIG. 4, FIG. 9.	
16	"designating said communication unit as	"designating said communication unit as said routing unit if it has at	10:33-11:54, 12:2-13:6, 14:62-15:48, FIG. 4, FIG. 9.	

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‘537 Claims	Term to be Construed	Huawei’s Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
	said routing unit in response to determining that said communication unit communicates with at least one neighboring unit that is isolated from communications with remaining neighboring units of said communication unit”	least one neighboring node that can establish communications with at least one other neighboring unit of that communication unit only through that communication unit”		
59, 64	“designating said communication unit as said relay unit based on said examination and in response to determining that at least one neighboring communication unit is required to utilize said communication unit to communicate with network communication units that are outside the range of and greater than one hop away from said neighboring communication unit” / “designate at least one communication unit as a relay unit to transfer	“designating said communication unit as said relay unit if it has at least one neighboring node that can communicate with nodes more than one hop away from itself only through the communication unit”	8:41-45, 10:33-11:54, 12:2-13:6, 14:62-15:48, FIG. 4, FIG. 9.	

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'537 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
	network information based on said examination and in response to determining that said at least one communication unit is required to be utilized by at least one neighboring unit to communicate with communication units that are outside the range of and greater than one hop away from said neighboring units"			
24	"designating said communication unit as a transmission routing unit in response to determining that said communication unit communicates with at least one neighboring routing unit that is isolated from communications with remaining neighboring routing units of said communication unit"	"designating said communication unit as a transmission routing unit if there is at least one neighboring routing unit of the communication unit that can establish communications with at least one other neighboring routing unit of that communication unit only through that communication unit"	10:33-11:54, 12:2-13:6, 14:62-15:48, FIG. 4, FIG. 9.	
48	"designating as said transmission routing	"designating as said transmission routing unit each communication	10:33-11:54, 12:2-13:6, 14:62-15:48, FIG. 4, FIG. 9.	

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‘537 Claims	Term to be Construed	Huawei’s Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
	unit each communication unit that communicates with at least one neighboring routing unit isolated from communications with remaining neighboring routing units of that communication unit”	unit that has at least one neighboring routing unit of the communication unit that can establish communications with at least one other neighboring routing unit of that communication unit only through that communication unit”		
1, 16, 30, 33, 36, 45, 54, 59, 64	“a [wireless] communications network”	“a network of connected [wireless] devices”	Abstract, 1:33-50, 2:2-11, 5:17-26, 6:42-62, 12:5-15, FIG. 1A, FIG. 5.	
1, 4-5, 10-11, 16, 18-19, 24-25, 38-40, 47-49, 54, 56, 58-59, 61, 63-64, 66, 68	“connectivity information”	Plain and ordinary meaning	8:13-18, 8:34-38, 9:63-67, 10:1-4, 11:55-59, 14:54-59, 15:35-42, 16:7-11.	
4, 18, 30, 33, 56, 61, 66	“unit status message”	“message containing connectivity information for that unit”	8:13-18, 8:34-38, 9:63-67, 10:1-4, 10:15-22, 11:55-59, 13:3-6, 14:54-59, 15:35-42.	

EXHIBIT B**Huawei's Proposed Claim Constructions – U.S. Patent No. 7,027,426**

'426 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
1, 8	Preamble	Preambles are limiting	4:56-5:2, Fig. 1-5, 8 Prosecution History and references cited therein, including the Reply to Office Action dated Mar 15, 2004, Reply to Office Action dated Aug 5, 2004, Reply to Office Action dated Mar 29, 2005, Appeal Brief filed Oct 11, 2005, Notice of Allowance dated Jan 12, 2006	
1, 8	"at the source node, selecting a route to the destination node on at least one of the plurality of electrically separate channels"	"at the source node, selecting one of a plurality of discovered routes to the destination node on at least one of the plurality of electrically separate channels."	3:4-7, 5:49-69, 6:45-50 Claims 5, 15, and 25 Prosecution History and references cited therein, including Notice of Allowance dated Jan 12, 2006, Appeal Brief dated Oct 11, 2005,	
18	"route selection unit to select a route to the destination node on at least one of the plurality of electrically separate channels"	"route selection unit to select one of a plurality of discovered routes to the destination node on at least one of the plurality of electrically separate channels"	<i>See above</i> for "at the source node, selecting a route to the destination node on at least one of the plurality of electrically separate channels"	

EXHIBIT B**Huawei's Proposed Claim Constructions – U.S. Patent No. 7,224,678**

'678 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
12, 51	<p>Preamble ("A wireless local or metropolitan area network comprising")</p> <p>Preamble ("An intrusion detection method for a wireless local or metropolitan area network comprising a plurality of stations, the method comprising")</p>	Preambles are limiting and indefinite	<p>1:8-10, 1:14-21, 2:32-41, 3:28-30, 5:45-51, Cl. 12.</p> <p>'678 patent prosecution at Supplemental Appeal Br., 2005-10-31, p.2.</p> <p><i>See also</i> 1:24, 1:27, 1:35, 1:37, 1:39, 1:43, 1:49, 2:25, 4:11-12, 4:17, 4:21, 4:25, 4:31, 4:36, 4:40, 4:45, 4:50, 5:45, 5:53, 6:46, 6:63, 6:67, 7:7, 7:10, 7:22, 7:30, 7:47, 7:56, 8:5, 8:18, 8:55, 10:36, 10:66.</p>	<p>Expert Testimony of Dr. James Olivier regarding what a person of ordinary skill in the art would understand the claim term to mean, based on the knowledge, experience, and understanding of a person of ordinary skill in the art, and upon reviewing the claims of the '678 patent, in view of the claim language, the drawings, the written description, the specification of the '678 patent as a whole, the file history of the '678 patent, and the extrinsic evidence.</p> <p><u>Newton's Telecom Dictionary, 15th Updated, Expanded, and Much Improved Edition, 1999:</u></p> <p><u>LAN:</u> A geographically localized network consisting of both hardware and software. LANs link personal computers, workstations, printers filer servers, and other peripherals. Devices on a LAN typically transmit data inside building or between buildings located near each other.</p>

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'678 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
				<p>A short distance data communications network (typically within a building or campus) used to link together computers and peripheral.</p> <p><u>MAN</u>: A loosely defined term generally understood to describe a data network covering an area larger than a local area network (LAN), but less than a wide area network (WAN).</p> <p><u>WAN</u>: First, there was a MAN, a metropolitan area network, that was a computer and voice network covering a geographic area in a city...Then there was WAN which is a computer and voice network bigger than a city or metropolitan area.</p> <p><u>Microsoft Computer Dictionary, Fourth Edition, 1999:</u></p> <p><u>LAN</u>: A group of computers and other devices dispersed over a relatively limited area and connected by a communications link that enables any device to interact with any other on the network.</p>

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'678 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
				<p><u>MAN</u>: A high-speed network that can carry voice, data, and images at up to 200 Mbps or faster over distances of up to 75 km. Based on the network architecture, the transmission speed can be higher for shorter distances. A MAN, which can include one or more LANs as well as telecommunications equipment such as microwave and satellite relay stations, is smaller than a wide area network but generally operates at a higher speed.</p> <p><u>WAN</u>: A geographically widespread network, one that relies on communications capabilities to link the various network segments. A WAN can be one large network, or it can consist of a number of linked LANs (local area networks).</p> <p><u>The Authoritative Dictionary of IEEE Standards Terms, Seventh Edition, 2000:</u></p> <p><u>LAN</u>: A computer network in which communication is limited to a geographic span of a few kilometers.</p>

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'678 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
				<p><u>MAN</u>: A computer network in which the geographic span is generally 5-50 km and operates at speeds greater than 1 Mb/s with physical layer data error ratio comparable to a LAN.</p> <p>A network for connecting a group of individual stations and networks [for example, local area networks (LANS)] located in the same urban area.</p> <p><u>WAN</u>: A communications network designed for large geographic areas.</p> <p>U.S. Patent No. 7,082,117</p> <p>U.S. Patent No. 6,986,161</p>
12, 13, 17, 18, 19, 20, 56	"wireless network"	"a network of connected wireless devices"	1:14-21, 2:36-41, 5:45-51, 6:38-39.	
12	"a policing station for detecting intrusions into the wireless network"	"one or more wireless stations and/or base stations for detecting intrusions into the wireless network"	1:26-33, 5:45-51, 6:8-16, 7:21-28, 10:60-67, 12:37-40.	
12, 17, 51, 56	"monitoring transmissions among	Plain and ordinary meaning	2:1-6, 2:62-67, 3:10-13, 6:23-31, 7:9-14.	

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'678 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
	said/[the] plurality of stations"			
12, 51, 52	"a number of failed attempts to authenticate a MAC address"	"one or more failed attempts to authenticate a MAC address"	2:49-54, 6:53-57. '678 patent prosecution at Supplemental Appeal Br., 2005-10-31, pp. 20-21.	
20	"base station"	"wireless device that facilitates communications between other devices in the wireless network"	1:17-27, 5:45-51.	

EXHIBIT B**Huawei's Proposed Claim Constructions – U.S. Patent No. 7,327,690**

'690 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
32, 40, 71, 78	<p>Preamble ("A wireless local or metropolitan area network comprising")</p> <p>Preamble ("An intrusion detection method for a wireless local or metropolitan area network comprising a plurality of stations, the method comprising")</p>	The preambles are limiting and indefinite	<p>1:8-10, 1:14-21, 2:32-39, 3:32-34, 5:57-63, Cl. 32.</p> <p>'678 patent prosecution at Supplemental Appeal Br., 2005-10-31, p.2.</p> <p><i>See also</i> 1:24, 1:39, 2:24, 2:33-34, 4:26-27, 4:31, 4:35, 4:40, 4:45, 4:49, 4:55, 4:58, 4:62, 5:57, 5:65, 6:4, 6:58, 7:8, 7:12, 7:22, 7:34, 7:42, 7:59, 8:2, 8:17, 8:30, 8:66, 10:46, 11:9.</p>	<p>Expert Testimony of Dr. James Olivier regarding what a person of ordinary skill in the art would understand the claim term to mean, based on the knowledge, experience, and understanding of a person of ordinary skill in the art, and upon reviewing the claims of the '690 patent, in view of the claim language, the drawings, the written description, the specification of the '690 patent as a whole, the file history of the '690 patent, and the extrinsic evidence.</p> <p><u>Newton's Telecom Dictionary, 15th Updated, Expanded, and Much Improved Edition, 1999:</u></p> <p><u>LAN</u>: A geographically localized network consisting of both hardware and software. LANs link personal computers, workstations, printers filer servers, and other peripherals. Devices on a LAN typically transmit data inside building or between buildings located near each other.</p>

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'690 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
				<p>A short distance data communications network (typically within a building or campus) used to link together computers and peripheral.</p> <p><u>MAN</u>: A loosely defined term generally understood to describe a data network covering an area larger than a local area network (LAN), but less than a wide area network (WAN).</p> <p><u>WAN</u>: First, there was a MAN, a metropolitan area network, that was a computer and voice network covering a geographic area in a city...Then there was WAN which is a computer and voice network bigger than a city or metropolitan area.</p> <p><u>Microsoft Computer Dictionary, Fourth Edition, 1999:</u></p> <p><u>LAN</u>: A group of computers and other devices dispersed over a relatively limited area and connected by a communications link that enables any device to interact with any other on the network.</p>

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'690 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
				<p><u>MAN</u>: A high-speed network that can carry voice, data, and images at up to 200 Mbps or faster over distances of up to 75 km. Based on the network architecture, the transmission speed can be higher for shorter distances. A MAN, which can include one or more LANs as well as telecommunications equipment such as microwave and satellite relay stations, is smaller than a wide area network but generally operates at a higher speed.</p> <p><u>WAN</u>: A geographically widespread network, one that relies on communications capabilities to link the various network segments. A WAN can be one large network, or it can consist of a number of linked LANs (local area networks).</p> <p><u>The Authoritative Dictionary of IEEE Standards Terms, Seventh Edition, 2000:</u></p> <p><u>LAN</u>: A computer network in which communication is limited to a geographic span of a few kilometers.</p>

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'690 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
				<p><u>MAN</u>: A computer network in which the geographic span is generally 5-50 km and operates at speeds greater than 1 Mb/s with physical layer data error ratio comparable to a LAN.</p> <p>A network for connecting a group of individual stations and networks [for example, local area networks (LANS)] located in the same urban area.</p> <p><u>WAN</u>: A communications network designed for large geographic areas.</p> <p>U.S. Patent No. 7,082,117</p> <p>U.S. Patent No. 6,986,161</p>
32, 34, 36, 40, 41, 71, 73, 75, 76, 78, 79	<p>“collisions”</p> <p>“collisions of packets”</p>	<p>“transmissions that are simultaneous or too close together”</p>	8:41-64.	
32, 71	<p>“a threshold number of collisions of packets having the predetermined packet type”</p>	<p>“one or more instances of packets of a predetermined type being transmitted simultaneously or too close together”</p>	8:41-64.	

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'690 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
40, 36, 75, 78, 79	"a threshold number of collisions of a same MAC address"	"one or more instances of at least two stations using the same MAC address simultaneously or relatively closely to one another"	8:65-9:11.	
32, 33, 34, 36, 38, 39, 40, 41, 42, 43	"wireless network"	"a network of connected wireless devices"	1:14-21, 2:36-39, 5:57-63, 6:47-50.	
32, 40	"a policing station for detecting intrusions into the wireless network"	"one or more wireless stations and/or base stations for detecting intrusions into the wireless network"	1:26-33, 5:57-63, 6:20-28, 7:33-40, 11:2-10, 12:47-50.	
32, 40, 71, 78	"monitoring transmissions among said/[the] plurality of stations"	Plain and ordinary meaning	2:1-6, 3:17-23. 6:35-43, 7:21-26.	
20	"base station"	"wireless device that facilitates communications between other devices in the wireless network"	1:21-34, 5:57-63.	
34, 41, 73, 76, 79	"greater than about three"	Indefinite	8:41-64, 8:65-9:11.	Expert Testimony of Dr. James Olivier regarding what a person of ordinary skill in the art would understand the claim term to mean, based on the knowledge, experience, and understanding of a person of ordinary skill in the art, and upon reviewing the claims of the '690 patent, in view of the claim language, the drawings, the written description, the specification of the '690 patent as

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'690 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
				a whole, the file history of the '690 patent, and the extrinsic evidence.

EXHIBIT B**Huawei's Proposed Claim Constructions – U.S. Patent No. 7,440,572**

'572 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
1, 47	"encrypting both address and data information"	"reversibly encoding both MAC address and MAC data information to protect from reading without decryption"	<p>1:46-55, 2:1-19, 3:58-64, 4:14-19, 4:20-24, 5:20-30, 6:18-20, Fig. 7</p> <p>Prosecution History and references cited therein, including Reply to Office Action dated Sep 27, 2005, Reply to Office Action dated Feb 27, 2006, Advisory Action dated March 22, 2006, Appeal Brief dated June 13, 2006, Appeal Brief dated Oct 4, 2006, Appeal Brief dated May 1, 2007, Reply to Office Action dated Nov 15, 2007, Reply to Office Action dated May 23, 2008.</p>	<p>Expert Testimony of Dr. Robert Akl regarding what a person of ordinary skill in the art would understand the claim term to mean, based on the knowledge, experience, and understanding of a person of ordinary skill in the art, and upon reviewing the claims of the '572 patent, in view of the claim language, the drawings, the written description, the specification of the '572 patent as a whole, the file history of the '572 patent, and the extrinsic evidence.</p> <p><u>US Pat. No. 5,946,308</u></p> <p><u>Stallings, Data & Computer Communications - 6th Ed.</u></p> <p><u>Que's Computer User's Dictionary, Que Corporation, 1990</u></p> <p><u>encryption</u>: The process of enciphering or encoding data so that the data cannot be read by users who do not possess the necessary password. See <i>decryption</i>.</p>

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'572 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
				<p><u>Dictionary of Electrical and Computer Engineering, McGraw-Hill, 2003</u></p> <p><u>encryption</u>: The coding of a clear text message by a transmitting unit so as to prevent unauthorized eavesdropping along the transmission line; the receiving unit uses the same algorithm as the transmitting unit to decode the incoming message.</p> <p><u>encrypt</u>: see encipher</p> <p><u>encipher</u>: to convert a plain-text message into unintelligible language by means of a cryptosystem. Also known as encrypt.</p> <p><u>Newton's Telecom Dictionary, 22nd Edition, CMP Books, 2006:</u></p> <p><u>encryption</u>: A fancy term for scrambling a message so that no one can read it except for the person for whom it's intended. In more formal terms, encryption is the transformation of data into a form unreadable by anyone without a secret decryption key.</p>

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'572 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
				<p><u>Dictionary of Computers, Data Processing, and Telecommunications, John Wiley & Sons, 1984</u></p> <p><u>encryption</u>:</p> <p>Coding of data for privacy protection, in particular when transmitted over telecommunication links.</p> <p><u>Dictionary of Computer and Internet Terms, Eighth Edition, Barron's Educational Series, Inc., 2003</u></p> <p><u>encryption</u>: The act of converting information into a code or cipher so that people will be unable to read it. A secret key or password is required to decrypt (decode) the information. More and more confidential data is being sent along computer networks, so it is becoming increasingly important to develop ways to send information over computer networks securely.</p>
1, 47	“decrypting both [the] address and	“recovering, upon reception, both [the] MAC address and [the] MAC data information that was	<i>See above</i> for “encrypting both address and data information”	Expert Testimony of Dr. Robert Akl regarding what a person of ordinary skill in the art would

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'572 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
	[the] data information upon reception"	encrypted"		<p>understand the claim term to mean, based on the knowledge, experience, and understanding of a person of ordinary skill in the art, and upon reviewing the claims of the '572 patent, in view of the claim language, the drawings, the written description, the specification of the '572 patent as a whole, the file history of the '572 patent, and the extrinsic evidence.</p> <p><u>US Pat. No. 5,946,308</u></p> <p><u>Stallings, Data & Computer Communications - 6th Ed.</u></p> <p><u>Que's Computer User's Dictionary, Que Corporation, 1990:</u></p> <p><u>decryption</u>: The process of deciphering data from an encrypted form so that the data can be read. See <i>encryption</i>.</p> <p><u>Dictionary of Electrical and Computer Engineering, McGraw-Hill, 2003</u></p>

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'572 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
				<p><u>decrypt</u>: To convert a cryptogram or series of electronic pulses into plain text by electronic means.</p> <p><u>Newton's Telecom Dictionary, 22nd Edition, CMP Books, 2006:</u></p> <p><u>decrypt</u>: To convert encrypted text into its equivalent plain text by means of a cryptosystem. This does not include solution by cryptanalysis. The term decrypt covers the meanings of decipher and decode.</p> <p><u>Dictionary of Computers, Data Processing, and Telecommunications, John Wiley & Sons, 1984</u></p> <p><u>decipher</u>: To convert enciphered data into clear data. Synonymous with decrypt. cf. <i>encipher</i>.</p> <p><u>decrypt</u>: Synonym for <i>decipher</i>.</p> <p><u>Dictionary of Computer and Internet Terms, Eighth Edition, Barron's Educational Series, Inc., 2003</u></p> <p><u>decryption</u>: Decoding – that is, translating information from an unreadable or secret format into a</p>

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'572 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
				form in which it can be used. <i>Contrast</i> ENCRYPTION.
1, 47	“a cryptography circuit ... [connected to said]/[cooperating with the] MAC ... for encrypting both address and data information”	“a cryptography circuit ... [connected to said]/[cooperating with the] MAC ... for reversibly encoding both MAC address and MAC data information to protect from reading without decryption”	1:46-54, 2:1-13, 4:14-19, 5:20-30, Fig. 7, Figs. 8-10 <i>See above</i> for “encrypting both address and data information”	Expert Testimony of Dr. Robert Akl regarding what a person of ordinary skill in the art would understand the claim term to mean, based on the knowledge, experience, and understanding of a person of ordinary skill in the art, and upon reviewing the claims of the '572 patent, in view of the claim language, the drawings, the written description, the specification of the '572 patent as a whole, the file history of the '572 patent, and the extrinsic evidence.
1, 47	“a cryptography circuit ... [connected to said]/[cooperating with the] MAC ... for decrypting both [the] address and [the] data information”	“a cryptography circuit ... [connected to said]/[cooperating with the] MAC ... for recovering both [the] MAC address and [the] MAC data information that was encrypted”	<i>See above</i> for “a cryptography circuit ... [connected to said]/[cooperating with the] MAC ... for encrypting both address and data information”	Expert Testimony of Dr. Robert Akl regarding what a person of ordinary skill in the art would understand the claim term to mean, based on the knowledge, experience, and understanding of a person of ordinary skill in the art, and upon reviewing the claims of the '572 patent, in view of the claim language, the drawings, the written description, the specification of the '572 patent as a whole, the file history of the

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'572 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
				'572 patent, and the extrinsic evidence.
1	"by at least adding a plurality of encrypting bits to both the address and the data information"	Plain and ordinary meaning	2:32-35, 5:42-45, FIG. 8 Prosecution History and references cited therein , including Reply to Office Action dated May 23, 2008	Expert Testimony of Dr. Robert Akl regarding what a person of ordinary skill in the art would understand the claim term to mean, based on the knowledge, experience, and understanding of a person of ordinary skill in the art, and upon reviewing the claims of the '572 patent, in view of the claim language, the drawings, the written description, the specification of the '572 patent as a whole, the file history of the '572 patent, and the extrinsic evidence.

EXHIBIT B**Huawei's Proposed Claim Constructions – U.S. Patent No. RE44,325**

RE'325 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
30, 48, 50, 57	“producing at least one test signal / producing at least first and second test signals”	Plain and ordinary meaning / No construction necessary	<p>1:58-63, 2:10-16, 2:45-52, 2:45-60, 2:64-67, 7:19-42, 7:37-42, 8:23-45, 8:56-62, 9:3-6, 9:23-10:32, 11:25-37, 11:38-48, 12:21-63, 13:39-57, Figs. 6 and 9, claims 1, 3, 8, 11, 14, 16, 21, 28, 31, 32, 38, 44, 54, 55.</p> <p>Prosecution History and references cited therein.</p> <p>Applications the patent claims priority to, including French patent applications FR 99/13,834, FR 00/04834, and FR 00/08,592.</p>	Expert Testimony of Dr. Nathaniel Davis regarding what a person of ordinary skill in the art would understand the claim term to mean, based on the knowledge, experience, and understanding of a person of ordinary skill in the art, and upon reviewing the claims of the '325 patent, in view of the claim language, the drawings, the written description, the specification of the '325 patent as a whole, the file history of the '325 patent, and the extrinsic evidence.
30, 48, 50, 57	“having an energy such that the terminal cannot be damaged under any circumstances”	“having an energy such that the terminal is not damaged by the test signal[s] regardless of whether the terminal is adapted to receive a remote power feed”	<p>Abstract, 1:58-63, 2:10-18, 2:39-44, 2:45-52, 2:45-60, 2:61-67, 7:37-42, 8:56-62, 9:3-6, 9:23-36, 9:26-34, 10:16-32, 11:1-7, 12:53-63.</p> <p>Prosecution History and references cited therein.</p> <p>Applications the patent claims priority to, including French patent applications FR 99/13,834, FR 00/04834, and FR 00/08,592.</p>	Expert Testimony of Dr. Nathaniel Davis regarding what a person of ordinary skill in the art would understand the claim term to mean, based on the knowledge, experience, and understanding of a person of ordinary skill in the art, and upon reviewing the claims of the '325 patent, in view of the claim language, the drawings, the written description, the specification of the '325 patent as a whole, the file history of the

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RE'325 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
				'325 patent, and the extrinsic evidence.

EXHIBIT B**Huawei's Proposed Claim Constructions – U.S. Patent No. 8,416,892**

'892 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
4	“wherein the number of preambles generated from a single root sequence is $N_{pre} = \lfloor N_{NC}/N_{CS} \rfloor$, “	“wherein the number of preambles generated from a single root sequence is $N_{pre} = \lfloor N_{ZC}/N_{CS} \rfloor$ ”	2:8-10, 4:41-44, 7:49-51, Claim 4, Claim 6, Claim 13 Prosecution History and references cited therein, including originally filed claims dated 08/11/2011, Amendments to the Claims and Reply to Office Action dated 05/16/2012, Amendments to the Claims and Reply to Final Office Action dated 10/25/2012.	Expert Testimony of Dr. Jonathan Wells regarding what a person of ordinary skill in the art would understand the claim term to mean, based on the knowledge, experience, and understanding of a person of ordinary skill in the art, and upon reviewing the claims of the '892 patent, in view of the claim language, the drawings, the written description, the specification of the '892 patent as a whole, the file history of the '892 patent, and the extrinsic evidence.
6, 15	“ $x_{u,v}(k) = x_{u,v}((k + vN_{CS}) \bmod N_{ZC})$ ”	“ $x_{u,v}(k) = x_u((k + vN_{CS}) \bmod N_{ZC})$ ”	1:29-1:35, 1:64-2:7, Claim 5, Claim 6 Prosecution History and references cited therein, including Amendments to the Claims and Reply to Office Action dated 05/16/2012, Amendments to the Claims and Reply to Final Office Action dated 10/25/2012.	Expert Testimony of Dr. Jonathan Wells regarding what a person of ordinary skill in the art would understand the claim term to mean, based on the knowledge, experience, and understanding of a person of ordinary skill in the art, and upon reviewing the claims of the '892 patent, in view of the claim language, the drawings, the written description, the specification of the '892 patent as a whole, the file history of the

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'892 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
				'892 patent, and the extrinsic evidence.

EXHIBIT B**Huawei's Proposed Claim Constructions – U.S. Patent No. 8,798,575**

'575 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
1, 16	"[determining / determine] a charging method and charging rules in response to a service request or other trigger event."	Plain and ordinary meaning / No construction necessary	<p>Abstract, 2:61-3:3, 3:27-54, 3:66-4:13, 4:33-39, 4:65-5:11, 5:35-48, 6:4-11, 6:39-52, 7:1-9, 7:14-16, 7:60-8:3, 8:43-51, 8:52-61, 9:1-20, 9:27-40, 9:47-51, 10:4-23, 10:54-64, 11:4-35;</p> <p>Figs. 2A, 2B, 3A, 3B, 3C, 4, 5, 6;</p> <p>Claim 2, Claim 8, Claim 17, Claim 19</p> <p>Prosecution History and references cited therein, including Amendments to the Claims and Reply to Office Action dated 09/04/2009, Amendments to the Claims and Reply to Final Office Action dated 03/03/2010, Reply to Office Action dated 06/02/2010, Pre-Appeal Brief dated 09/13/2010, Appeal Brief dated 02/15/2011.</p>	Expert Testimony of Dr. Charles Jackson regarding what a person of ordinary skill in the art would understand the claim term to mean, based on the knowledge, experience, and understanding of a person of ordinary skill in the art, and upon reviewing the claims of the '575 patent, in view of the claim language, the drawings, the written description, the specification of the '575 patent as a whole, the file history of the '575 patent, and the extrinsic evidence.

EXHIBIT B**Huawei's Proposed Claim Constructions – U.S. Patent No. 9,838,851**

'851 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
1, 5	“set[ting] a first subframe to null”	”set[ting] a first subframe such that the first subframe does not interfere with DSI in subframes transmitted by other eNBs”	Abstract, 2:42, 3:17-23, 3:64, 5:29, 5:36-62, 6:24-7:28, 9:17, 10:58, 11:7, 12:37, 13:45, Fig. 1 Prosecution History and references cited therein, including Mar. 20, 2017 Amendment Submitted/Entered with RCE at 5.	Expert Testimony of Dr. Charles Jackson regarding what a person of ordinary skill in the art would understand the claim term to mean, based on the knowledge, experience, and understanding of a person of ordinary skill in the art, and upon reviewing the claims of the '851 patent, in view of the claim language, the drawings, the written description, the specification of the '851 patent as a whole, the file history of the '851 patent, and the extrinsic evidence.

EXHIBIT B**Huawei's Proposed Claim Constructions – U.S. Patent No. 10,117,226**

'226 Claims	Term to be Construed	Huawei's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
1, 6, 11	“a same scheduling period in which another base station resumes sending the multimedia broadcast multicast service data in [a same multimedia broadcast multicast service single frequency network (MBSFN) area / the same MBSFN area]”	Plain and ordinary meaning / No construction necessary	Abstract, 1:56-65, 2:22-31, 3:13-26, 4:51-6:24, 7:55-8:20, 8:36-9:13, 11:58-12:20, 12:40-52, 13:33-44, 13:61-14:31, 14:44-15:65, 16:26-41, 17:24, 17:42-50, 17:64, 18:40.	Expert Testimony of Dr. Charles Jackson regarding what a person of ordinary skill in the art would understand the claim term to mean, based on the knowledge, experience, and understanding of a person of ordinary skill in the art, and upon reviewing the claims of the '226 patent, in view of the claim language, the drawings, the written description, the specification of the '226 patent as a whole, the file history of the '226 patent, and the extrinsic evidence.